

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)
)
Plaintiff,)
) C.A. No. 04cv11125 NG
v.)
)
STAMPRETE OF RHODE ISLAND, STAMP)
CRETE OF RHODE ISLAND, INC.)
AND STAMPED CONCRETE, INC.)
)
Defendant,)
)

**MOTION TO EXTEND THE DEADLINE FOR DISCOVERY AND TO
RESCHEDULE THE STATUS CONFERENCE**

NOW COME the parties in the above named matter and request an extension of the discovery deadline from April 29, 2005 to June 29, 2005. The extension is required in order to conduct additional depositions, allow the parties additional time to respond to written discovery and to obtain information from the Receiver appointed by the Rhode Island Superior court in the receivership of Defendant Stamp Crete of Rhode Island, Inc. It is further requested that the deadline for filing dispositive motions be extended to August 15, 2005 and that the status conference now scheduled for April 28, 2005 be rescheduled to a date following the end of discovery.

For the Plaintiff,

CHARLES LANGONE, as FUND MANAGER
Of the NEW ENGLAND TEAMSTERS AND
TRUCKING INDUSTRY PENSION FUND,

By his Attorney,

/S/ Catherine M. Campbell
Catherine M. Campbell
BBO #549397
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177 Milk Street
Boston, MA 02109
(617) 338-1976

Dated: April 21, 2005

For the Defendants,

STAMPRETE OF RHODE ISLAND,
STAMP CRETE of RHODE
ISLAND, INC., and
STAMPED CONCRETE, INC.
By their Attorney,

/S/ Bruce E. Thompson
Bruce E. Thompson, Esq.
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Dated: April 21, 2005